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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AUSTIN CRAIG KOEHM, an individual

Plaintiff,

v.

GEORGII IAKUSHKIN, and individual; V
LINE INC., a foreign corporation; DOES I
through XX, inclusive; and ROE BUSINESS
ENTITIES I through XX, inclusive,

Defendants.

CASE NO.: 2:23-cv-01004

**STIPULATION TO EXTEND
DISCOVERY
(First Request)**

Plaintiff AUSTIN CRAIG KOEHM ("Plaintiff"), by and through his counsel of record Donald Paradiso, Esq., of the LADAH LAW FIRM, and Defendants V-Line, Inc., and Georgii Iakushkin, by and through their counsel of record Prescott T. Jones, Esq., and Dylan E. Houston, Esq., of the law firm Resnick & Louis, P.C., hereby stipulate to extend the dates set forth in the operative Discovery Plan and Scheduling Order dated August 18, 2023 (ECF No. 14) by ninety (90) days in accordance with LR IA 6-1 and LR 26-3. This is the first request for an extension of the discovery deadlines. As demonstrated herein, the parties have been moving forward diligently and cooperatively with discovery.

I. DISCOVERY COMPLETED TO DATE

1. The Parties have served their initial disclosures of witnesses and documents.
2. Plaintiff has served requests for production of documents and interrogatories on

Defendants.

3. Defendant V-Line, Inc. has served interrogatories, requests for production of documents and requests for admission to Plaintiff.

4. Defendants have requested but have yet to receive records from all of Plaintiff's medical providers.

II. DISCOVERY TO BE COMPLETED

1. Responses to Written Discovery and additional document disclosures.

2. Additional written discovery by all parties.

3. Depositions of the Parties and treating physicians.

4. Site visit(s), and expert disclosures.

5. Expert depositions.

III. REASONS WHY THE REMAINING DISCOVERY WAS NOT COMPLETED AND NEED FOR EXTENSION OF TIME

The parties continue to work diligently and cooperatively in their discovery efforts. However, the Parties need to conduct depositions and gather Plaintiff's medical records prior to disclosing experts. The Parties also need additional time to conduct the Deposition of Defendant Iakushkin since he is a truck driver and on the road often making scheduling a deposition hard due to unavailability. The Parties expect that the 90 day extension will allow sufficient time to complete the discovery described above.

IV. PROPOSED REVISED DISCOVERY PLAN

A. Summary of Proposed Changes:

The parties hereby stipulate to continue the discovery deadlines and dispositive motions deadline set forth in the operative Discovery Plan and Scheduling Order dated August 18, 2023 (ECF No. 14) by 90-days as set forth below:

DESCRIPTION	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery Cutoff	December 27, 2023	March 27, 2024
Deadline to Amend Pleadings and Add Parties	September 28, 2023	December 28, 2023
Initial Expert Disclosures	October 27, 2023	January 29, 2024

Rebuttal Expert Disclosures	November 24, 2023	February 29, 2024
Deadline for the filing of dispositive motions	January 26, 2024	April 26, 2024
Deadline to file the joint pretrial order	February 23, 2024	May 27, 2024

SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:

LADAH LAW FIRM

RESNICK & LOUIS, P.C.

*/s/ Donald P. Paradiso**/s/ Prescott T. Jones*

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ORDER

The deadlines set forth in the operative Discovery Plan and Scheduling Order dated August 18, 2023 (ECF No. 14) are hereby reset as follows:

DESCRIPTION	DEADLINE
Discovery Cutoff	March 27, 2024
Deadline to Amend Pleadings and Add Parties	December 28, 2023
Initial Expert Disclosures	January 29, 2024
Rebuttal Expert Disclosures	February 29, 2024
Deadline for the filing of dispositive motions	April 26, 2024
Deadline to file the joint pretrial order	May 27, 2024

IT IS SO ORDERED.

Dated this 31st day of October, 2023.



UNITED STATES MAGISTRATE JUDGE